UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MISSOURI
EASTERN DIVISION

SUPPRESSED

FILED
APR 20 2016
U.S. DISTRICT COURT
EASTERN DISTRICT OF MO
ST. LOUIS

UNITED STATES OF AMERICA, Plaintiff, vs. RUSSELL EUGENE VINCENT and QUR'AN VINCENT, Defendants.	)))))))))	No. **4:16CR00173 HEA/SPM**

INDICTMENT

COUNT ONE

The Grand Jury charges that:

On or about August 19, 2015, in the County of St. Louis, within the Eastern District of Missouri,

RUSSELL EUGENE VINCENT,

the defendant herein, did knowingly use and maintain the premises of 11481 Las Ladera Drive, St. Louis County, Missouri, for the purpose of manufacturing, distributing, or using a controlled substance.

In violation of Title 21, United States Code, Section 856(a)(1), and punishable under Title 21, United States Code, Section 856(b).

COUNT TWO

The Grand Jury further charges that:

On or about August 19, 2015, in the County of St. Louis, within the Eastern District of Missouri,

RUSSELL EUGENE VINCENT,

the Defendant herein, having been previously convicted of one or more crimes punishable by a term of imprisonment exceeding one year, did knowingly possess one or more firearms, which traveled in interstate or foreign commerce during or prior to being in the Defendant's possession.

In violation of Title 18, United States Code, Section 922(g)(1).

COUNT THREE

The Grand Jury further charges that:

On or about August 19, 2015, in the County of St. Louis, within the Eastern District of Missouri,

RUSSELL EUGENE VINCENT and QUR'AN VINCENT,

the Defendants herein, acting together, did knowingly and intentionally possess with intent to distribute a quantity of marijuana, a Schedule I controlled substance drug.

In violation of Title 21, United States Code, Section 841(a)(1), and Title 18, United States Code, Section 2(a), and punishable under Title 21, United States Code, Section 841(b)(1)(D).

COUNT FOUR

The Grand Jury further charges that:

On or about August 19, 2015, in the County of St. Louis, within the Eastern District of Missouri,

RUSSELL EUGENE VINCENT and QUR'AN VINCENT,

the Defendants herein, acting together, did knowingly and intentionally possess with intent to distribute a mixture or substance containing a detectable amount of cocaine, a Schedule II controlled substance drug.

In violation of Title 21, United States Code, Section 841(a)(1), and Title 18, United States Code, Section 2(a), and punishable under Title 21, United States Code, Section 841(b)(1)(C).

COUNT FIVE

The Grand Jury further charges that:

On or about August 19, 2015, in the County of St. Louis, within the Eastern District of Missouri,

RUSSELL EUGENE VINCENT and QUR'AN VINCENT,

the Defendants herein, acting together, did knowingly and intentionally possess with intent to distribute a mixture or substance containing a detectable amount of cocaine base ("crack cocaine"), a Schedule II controlled substance drug.

In violation of Title 21, United States Code, Section 841(a)(1), and Title 18, United States Code, Section 2(a), and punishable under Title 21, United States Code, Section 841(b)(1)(C).

COUNT SIX

The Grand Jury further charges that:

On or about August 19, 2015, in the County of St. Louis, within the Eastern District of Missouri,

RUSSELL EUGENE VINCENT and QUR'AN VINCENT,

the Defendants herein, acting together, did knowingly possess one or more firearms in furtherance of a drug trafficking crime which may be prosecuted in a court of the United States, that is, possession with intent to distribute one or more controlled substances as set forth in Counts Three, Four, and Five.

In violation of Title 18, United States Code, Sections 2(a) and 924(c)(1), and punishable under Title 18, United States Code, Section 924(c)(1)(C).

FORFEITURE ALLEGATION

The Grand Jury further finds by probable cause that:

1. Pursuant to Title 21, United States Code, Sections 853, upon conviction of an offense in violation of Title 21, United States Code, Sections 856(a)(1) or 841(a)(1), as set forth in Counts One, Three, Four, and Five; the defendants shall forfeit to the United States of America any property, constituting or derived from any proceeds obtained, directly or indirectly, as the result of such violation(s) and any property used or intended to be used, in any manner or part to commit or to facilitate the commission of such violation(s).

2. Pursuant to Title 18, United States Code, Section 924(d)(1) and Title 28, United States Code, Section 2461(c), upon conviction of an offense of Title 18, United States Code, Sections 922 or 924 as set forth in Counts Two and Six, the defendants shall forfeit to the United States of America any firearm or ammunition involved in, used or intended to be used in said violation(s).

3. Specific property subject to forfeiture includes, but is not limited to, the following:

a) $43,392.00 in United States currency;

b) One Glock make, 26 model, 9 mm Luger caliber semi-automatic pistol, bearing serial number LCY109;

c) One Glock make, 27 model, .40 S&W caliber semi-automatic pistol, bearing serial number WKY524;

d) One Ruger make, SR40c model, .40 S&W caliber semi-automatic pistol, bearing serial number 343-62082;

e) One Taurus make, PT145 Pro model, .45 ACP caliber semi-automatic pistol, bearing serial number NDM15715; and

f) Various calibers of ammunition and firearms magazines.

4. If any of the property described above, as a result of any act or omission of the defendants:

a. cannot be located upon the exercise of due diligence;

b. has been transferred or sold to, or deposited with, a third party;

c. has been placed beyond the jurisdiction of the court;

d. has been substantially diminished in value; or

e. has been commingled with other property which cannot be divided without difficulty, the United States of America will be entitled to the forfeiture of substitute property pursuant to Title 21, United States Code, Section 853(p).

A TRUE BILL

____

FOREPERSON

RICHARD G. CALLAHAN
United States Attorney

____

SAYLER A. FLEMING, #58775MO
Assistant United States Attorney